

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

DANIEL D'AMBL Y,

Plaintiff,

v.

CHRISTIAN EXOO a/k/a ANTIFASH
GORDON; ST. LAWRENCE UNIVERSITY;
TRIBUNE PUBLISHING COMPANY; NEW
YORK DAILY NEWS; VIJAYA GADDE;
TWITTER, INC; COHEN, WEISS AND
SIMON, LLP;

Defendants.

Civil Action No: 2:20-cv-12880-JMV-JAD

**DECLARATION OF
PATRICK J. CAROME, ESQ. IN
SUPPORT OF APPLICATION FOR
PRO HAC VICE ADMISSION**

I, Patrick J. Carome, Esq., do hereby certify and declare as follows:

1. I am a Partner in the law firm of Wilmer Cutler Pickering Hale and Dorr LLP.

I am fully familiar with the facts and circumstances surrounding this litigation, and I submit this Declaration in support of the application of Defendants Vijaya Gadde and Twitter, Inc. ("Defendants") for my admission *pro hac vice* pursuant to Local Civil Rule 101.1(c). Defendants have appeared for the limited purpose of setting a schedule to answer or otherwise respond to the complaint in this case but not for the purpose of appearing either generally or specifically in this jurisdiction. Defendants do not waive their right to challenge service of process or jurisdiction in this matter.

2. Attached hereto as Exhibit A is a true and correct table that identifies each bar in which I am a member in good standing, including the year of admission and, to the best of my knowledge, the name and address of the official or office maintaining the roll of such members of its bar.

3. No disciplinary proceedings are pending against me in any jurisdiction and no

discipline has previously been imposed on me in any jurisdiction. I understand my continuing obligation to advise the Court of any disciplinary proceeding that may be instituted against me.

4. I am ineligible for plenary admission to the bar of this Court under Local Civil Rule 101.1(b).

5. The issues raised in this litigation involve areas with which I have experience in the law.

6. Pursuant to the rules of this Court, all pleadings submitted on behalf of Defendants in this litigation will be signed by the firm of Gibbons P.C., attorneys of record for Defendants.

7. I agree to strictly observe the dates fixed for scheduling conferences, motions, briefs, pre-trial conferences, trial or other proceedings. I further agree to submit to the jurisdiction of this Court for the purposes of sanctions, discipline, or other such action as the Court may deem proper.

8. Pursuant to Local Civil Rule 101.1(c)(2), I agree to pay the annual fee required by the New Jersey Lawyers' Fund for Client Protection in accordance with New Jersey Court Rule 1:28-2.

9. Pursuant to Local Civil Rule 101.1(c)(3), I agree to make the required payment to the Clerk, United States District Court.

10. For the foregoing reasons, I respectfully request on behalf of Defendants that I be admitted *pro hac vice* for the purpose of representing them in this matter in association with New Jersey counsel. I agree to be bound by the rules governing practice in the New Jersey Courts, including the disciplinary rules.

I certify and declare under penalty of perjury that the foregoing is true and correct.

DATED: Oct. 27, 2020

A handwritten signature in black ink, appearing to read 'Patrick J. Carome', written over a horizontal line.

Patrick J. Carome, Esq.

WILMER CUTLER PICKERING HALE
AND DORR LLP

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Washington, DC 20006

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EXHIBIT A

Bar	Year of Admission	Name and Address of the Official or Office Maintaining the Bar's Roll
United States Supreme Court	1988	Clerk, Supreme Court of the U. S. ATTN: Admissions Office One First Street, NE Washington, DC 20543
United States Court of Appeals for the District of Columbia Circuit	1987	E. Barrett Prettyman U.S. Courthouse and William B. Bryant Annex 333 Constitution Avenue, NW Washington, DC 20001-2866
United States Court of Appeals for the First Circuit	2003	Clerk's Office United States Court of Appeals for the First Circuit John Joseph Moakley U.S. Courthouse 1 Courthouse Way, Suite 2500 Boston, MA 02210
United States Court of Appeals for the Second Circuit	2001	Clerk's Office U. S. Court of Appeals for the Second Circuit 40 Centre Street (40 Foley Square), New York, NY 10007.
United States Court of Appeals for the Third Circuit	2013	Clerk's Office United States Court of Appeals for the Third Circuit James A. Byrne United States Courthouse 601 Market Street Philadelphia, PA 19106
United States Court of Appeals for the Fourth Circuit	1989	Clerk's Office Fourth Circuit Court of Appeals Lewis F. Powell Jr. Courthouse & Annex 1100 East Main Street, Suite 501 Richmond, VA 23219
United States Court of Appeals for the Fifth Circuit	2007	Clerk's Office U.S. Court of Appeals For The Fifth Circuit 600 S. Maestri Place, Suite 115 New Orleans, LA 70130
United States Court of Appeals for the Sixth Circuit	2013	Clerk's Office Sixth Circuit Court of Appeals Potter Stewart U.S. Courthouse 100 East Fifth Street Cincinnati, Ohio 45202
United States Court of Appeals for the Seventh Circuit	2001	Clerk's Office U.S. Court of Appeals for the Seventh Circuit Everett McKinley Dirksen United States Courthouse 219 S. Dearborn Street

		Room 2722 Chicago, IL 60604
United States Court of Appeals for the Eighth Circuit	1997	Clerk's Office Thomas F. Eagleton Courthouse 111 South 10th Street St. Louis, MO. 63102
United States Court of Appeals for the Ninth Circuit	1992	Clerk's Office James R. Browning United States Courthouse 95 Seventh Street San Francisco, CA 94103-1518
United States Court of Appeals for the Tenth Circuit	1999	Clerk's Office Byron White Court House 1823 Stout Street Denver, CO 80257
United States Court of Appeals for the Eleventh Circuit	2020	David J. Smith Clerk of Court U.S. Court of Appeals for the 11th Circuit 56 Forsyth St., N.W. Atlanta, Georgia 30303
United States District Court for the District of Columbia	1985	Clerk's Office Attorney Admissions 333 Constitution Avenue, NW Room 1225 Washington, DC 20001
United States District Court for the District of Colorado	1999	Clerk's Office Alfred A. Arraj Courthouse, 901 19th St., Denver Colorado, 80294
United States District Court for the Eastern District of Michigan	1998	Clerk's Office Theodore Levin U.S. Courthouse 231 W. Lafayette Blvd., Room 599 Detroit, MI 48226
District of Columbia Court of Appeals	1985	Committee on Admissions DC Court of Appeals, Room 123 430 E Street, NW Washington, DC 20001
Supreme Judicial Court of Massachusetts	1984	Maura S. Doyle, Clerk John Adams Courthouse, 1st Floor, One Pemberton Square, Suite 1300, Boston, MA 02108-1707
United States Court of Military Appeals	1988	Clerk of the Court, USCAAF 450 E Street, NW Washington, D.C. 20442-0001
United States Court of Federal Claims	1996	Clerk's Office Howard T. Markey National Courts Building 717 Madison Place, NW, Washington, DC 20439